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September 30, 2020

**VIA CM/ECF**

Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
New York, New York 10007

Re: Kassman v. KPMG LLP, Civ. No. 11-cv-3743 (LGS)

Dear Judge Schofield:

The Parties have agreed to pursue mediation in an attempt to resolve all pending claims in this matter. The Parties have exchanged names of potential mediators, and are working cooperatively to reach agreement on a mediator. In addition, in response to KPMG's request made to ensure that mediation has the potential to be productive, Plaintiffs' counsel has confirmed that it has thus far received authority from each of the Named Plaintiffs and 425 of the 452 former opt-in plaintiffs who have submitted Verified Fact Sheets ("VFS Claimants") to represent them in settlement negotiations. Certain additional VFS Claimants also have agreed to stipulate to the dismissal of their claims. Plaintiffs' counsel is continuing to communicate with their clients and to provide updates to KPMG.

The Parties propose that, on or before October 14, 2020, they file with the Court (1) a proposed Order staying the case pending mediation and (2) any stipulated dismissals of VFS Claimants.

Respectfully Submitted,

*Kate Muetting, Counsel for Plaintiffs*  
*Colleen M. Kenney, Counsel for KPMG*

CC: All Counsel of Record, via ECF